

# UNITED STATES DISTRICT COURT

for the  
Eastern District of Missouri

In the Matter of the Search of )  
)  
2713 Hermitage Avenue Saint Louis, Missouri 63143 ) Case No. 4:22 MJ 1112 JMB  
(hereinafter referred to as the target location), further ) SIGNED AND SUBMITTED TO THE COURT FOR  
described in Attachment A ) FILING BY RELIABLE ELECTRONIC MEANS.  
)  
) FILED UNDER SEAL

## APPLICATION FOR A SEARCH WARRANT

I, Jared M. Ruhland, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

**2713 Hermitage Avenue Saint Louis, Missouri 63143** (hereinafter referred to as the **target location**), further described in **Attachment A**,

located in the EASTERN District of MISSOURI, there will be concealed following the fulfillment of the contingency set forth in the affidavit, the following:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i>                 | <i>Offense Description</i>                                   |
|-------------------------------------|--|
| Title 21, U.S.C., § 841(a)(1) & 846 | Possession with intent to distribute controlled substance(s) |
| Title 21, U.S.C., § 843(b)          | Use of a communication facility to facilitate drug felony    |

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

I state under penalty of perjury the foregoing is true and correct.

Jared M. Ruhland  
*Applicant's signature*

Jared M. Ruhland, USPIS

*Printed name and title*

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41.

Date: April 11, 2022

John M. Bodenhausen  
*Judge's signature*

City and State: St. Louis, MO

Hon. John M. Bodenhausen, U.S. Magistrate Judge  
*Printed name and title*

AUSA: REA

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Jared M. Ruhland, being duly sworn, state the following:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS). I have been employed by the USPIS for approximately five (5) years. I have been assigned to the Saint Louis, Missouri Narcotics Team for approximately five (5) years. I have received advanced training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States mail. The St. Louis Field Office's Narcotics Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. Prior to my employment with the USPIS, I was employed by the St. Louis County Police Department from September 2008 through April 2017. While employed with the St. Louis County Police Department, I was assigned to the Division of Patrol as a Police Officer and the Division of Crimes Against Property as a Detective.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail – two-day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an

individual to an individual. Express Mail is seldom used for individual-to-individual correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and Internet package tracking service, as well as the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or

proceeds/payments of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances or proceeds/payments, indicated that these labels are usually from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company. Additionally, this analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or addressed to a known narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and/or the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address.

5. The U.S. Postal Inspection Service St. Louis Field Office's Narcotics Team has found the characteristics listed in paragraphs three and four are indicative of packages, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances. Because this affidavit is submitted for the limited purpose of

securing search and seizure warrants, it does not include each and every fact known to me concerning this investigation, and sets forth only those facts believed necessary to establish probable cause that violations of Title 21, U.S.C. §§ 841(a)(1), 846 and 843(b), have occurred, are occurring, and will occur.

6. This affidavit in support of an anticipatory search warrant for the following location further identified as: **2713 Hermitage Avenue Saint Louis, Missouri 63143** (hereinafter referred to as the **Target Location**), further described in **Attachment A** as a single family residence tan sided structure. The residence has a brown door. The numbers “2713” are gold colored to the right of the door. Photographs of the **Target Location** are attached hereto and made a part of this Affidavit as **Attachment A**.

7. Inspectors routinely review postal business records in order to identify suspected mail packages that could contain narcotics. In reviewing postal business records, investigators attempt to identify mailings that originate from a particular source. In April of 2022, Inspectors identified a suspicious mailing destined to 2713 Hermitage Avenue Saint Louis, Missouri 63143.

8. An ongoing investigation is being conducted into the Drug Trafficking Organization (DTO) of several individuals in the Eastern District of Missouri by the Drug Enforcement Administration (DEA), Homeland Security Investigation (HSI), Jefferson County Sheriff’s Office, and the USPIS. Inspectors identified a pattern of suspicious mailings destined to various addresses in the Saint Louis Metropolitan Area, which has linked a number of individuals and addressees to prior seizures of approximately fifty seven

(57) pounds of TruNarc tested methamphetamine discovered inside seven (8) postal packages.

9. Investigators have surveilled past packages destined to several of the known addresses receiving suspicious packages connected to the DTO. The individuals, suspected to be members of the DTO, have picked up the packages from various addresses and shortly thereafter made stops at various locations, including 400 North 4<sup>th</sup> Street, 1209 Washington Avenue, and 9631 Antigo Drive, St. Louis, Missouri, prior to ultimately traveling to the 4200 US Highway 67 address, as well as other known drug trafficking addresses. Through the course of the investigation, investigators have discovered that a member of the DTO, Jorge Romero Sanchez, has been living at 2713 Hermitage Avenue. Among other things such as a previous seizure of methamphetamine destined to 2713 Hermitage Avenue, Romero Sanchez has been involved in the distribution of methamphetamine on behalf of several members of the DTO. Romero Sanchez was arrested with several pounds of methamphetamine that was to be delivered to a Saint Louis member of the DTO. The investigate team has discovered that he is used as a courier to transport and deliver narcotics to local dealers. Others connected to the DTO have also been associated with the address.

10. Through law enforcement and postal databases, investigators learned that several addresses to include 2713 Hermitage have received suspicious packages in the past.

11. A mail watch was placed on the associated address at 2713 Hermitage Avenue in order to identify any further suspicious packages that were sent to this address.

12. On April 6, 2022, Inspectors discovered a package through postal business records that was destined for 2713 Hermitage Avenue. Priority Mail package **9505513822772095606666** (hereinafter “**Subject Package**”) was originating from Long Beach, California, and was scheduled to be delivered on April 8, 2022.

13. On Thursday, April 7, 2022, Inspectors responded to the Network Distribution Center (NDC) and located the **Subject Package**. Once located, Inspectors reviewed the label on the **Subject Package**. The **Subject Package** was mailed on April 6, 2022, from the Long Beach, California, 90804, Post Office. The **Subject Package** was addressed person-to-person, heavily taped, had a handwritten label, was linked to the ongoing investigation through postal business records as well as surveillance activities, and the address was linked to prior methamphetamine seizures and originated from a known source narcotics area: Long Beach, California. The characteristics listed in this paragraph are consistent with characteristics of previous packages that have contained narcotics or proceeds of narcotics. Due to these characteristics, Inspectors reviewed the sender and addressee information printed on the **Subject Package** in order to verify the validity of the addressee and sender listed on the Priority Mail label.

14. The **Subject Package** was addressed to “Nicole Sekyrd 2713 Hermitage Ave Saint Louis, Mo 63143” with a return address of “George Villa 615 Junipero Ave Long Beach CA 90814.” A review of available law enforcement databases revealed that the sender address of 615 Junipero Avenue was a valid mailing address; however the sender name “George Villa” was not a name associated with the sender address. In the past, narcotics traffickers have utilized fictitious sender names on mailings labels in an attempt

to avoid law enforcement detection. A review of available law enforcement databases revealed that the addressee address of 2713 Hermitage Avenue was a valid mailing address and the recipient name “Nicole Sekyra” is associated with that address.

15. On Friday, April 8, 2022 the Honorable Patricia L. Cohen, United States Magistrate Judge in the Eastern District of Missouri, signed a search warrant authorizing your affiant to search the **Subject Package** (Cause Number 4:21 MJ 6094 PLC).

16. I executed the aforementioned search warrant at approximately 11:54 A.M. on April 8, 2022 for the **Subject Package**. When the **Subject Package** was opened, I recovered a black plastic trash bag. After opening the trash bag, Inspectors recovered seven (7) heat sealed bags which contained a white crystal-like substance inside of heat sealed bags. The white crystal-like substance was subsequently field tested with a TruNarc, which showed a positive indication of methamphetamine. The total approximate weight of the methamphetamine was seven (7) pounds. Based on my training and experience, as well as the training and experience of other members of the St. Louis, MO USPIS Narcotics Team, I know that this amount of methamphetamine is street-valued at approximately \$42,000.00. Consequently, I know that the methamphetamine involved in this seizure has a wholesale value of \$42,000.00 Further, I know that this amount of drug is consistent with the intent to distribute.

17. Inspectors and members of the DEA intend to make a controlled delivery of the **Subject Package** to the **Target Location**. In conjunction with the controlled delivery, I am seeking an anticipatory search warrant to be executed at the **Target Location**



contingent on the delivery of the **Subject Package**. Inspectors will replace the removed methamphetamine with a “look-a-like” or “sham” substance. The **Subject Package** will then be resealed to give the appearance it has not been opened. An undercover Postal Inspector, posing as a U.S. Postal Service letter carrier will attempt to deliver the **Subject Package** to the addressee at the **Target Location**.

18. Investigators will subsequently make entry into the **Target Location** and execute the search warrant only if the **Subject Package** is successfully delivered, and authority to enter is contingent upon the conditions of a successful delivery of the **Subject Package** as described below.

19. It has been my experience in prior controlled deliveries that the **Subject Package** will be opened shortly after it is delivered. In light of these circumstances, there may be practical difficulties in obtaining a search warrant in a timely fashion before the evidence in the **Subject Package** is removed from the premises and/or destroyed. Therefore, I request that a search warrant for the premises known and described as **2713 Hermitage Avenue, Saint Louis Missouri 63143 (Target Location)** be issued today with its execution contingent upon fulfillment of the following procedure:

a. On or about Monday, April 11, 2022 and in the event the delivery is unsuccessful, on succeeding dates thereafter, within the time period authorized, I or another U.S. Postal Inspector, wearing a USPS Letter Carrier uniform, will attempt to deliver the above-mentioned **Subject Package** to the **Target Location**;

b. Delivery will be made only to an adult willing to accept delivery on behalf of “Nicole Sekyra” to whom the **Subject Package** is addressed, or left on the front porch should nobody answer the front door during the delivery of the **Subject Package** (no signature is required on the **Subject Package**). Every effort will be made to make the delivery to the intended recipient, and in no event will the **Subject Package** be delivered/left with a child.

c. Once the delivery has been made, investigating agents will execute the search warrant within the time period authorized.

d. The warrant will be executed on the **Target Location** only if and after the **Subject Package** is accepted at or near the vicinity of the **Target Location** and crosses the threshold of the front of the residence.

20. Based upon my training and experience, and the training and experience of other members of the USPIS St. Louis, MO Narcotics Team, and our participation in other investigations involving this amount of drugs, I know that the drugs involved in this seizure have a wholesale value of approximately \$42,000.00. I know that the drugs of this quantity and value are intended for distribution; and

a. Persons who distribute this quantity and value commonly keep records relating to the transportation, order, purchasing, and distribution of controlled substances; and

b. That narcotics traffickers who handle narcotics of this value and quantity must maintain on hand large amounts of U.S. currency in order to maintain and finance their on-going narcotics business and often keep said currency in a residence; and

c. That persons who receive drugs through overnight parcels often have done so in the past and are prepared to do so in the future and keep mailing labels both used and unused; and

d. That persons who distribute narcotics of this quantity and value keep paraphernalia for packaging, cutting, weighing, and distribution of drugs. That these paraphernalia include, but are not limited to scales, plastic bags, cutting agents, firearms for protection; and

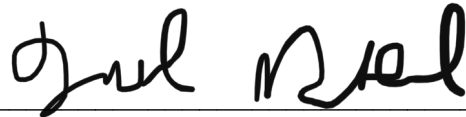
e. That evidence of occupancy, residency, rental and/or ownership of the premises is relevant to the prosecution of the offenses, which this affidavit establishes.

21. Based on my training and experience, as well as the training and experience of other members of the USPIS St. Louis, MO Narcotics Team, it is my belief that in light of the information learned in the investigation, there is probable cause to believe that the **Target Location** is being used as a location to receive, store, and/or distribute methamphetamine. Wherefore, your affiant respectfully requests that an anticipatory search warrant be issued authorizing any Postal Inspector of the United States Postal Inspection Service to search the premises known and described as **2713 Hermitage Avenue Saint Louis, Missouri 63143 (the Target Location)** and therein to seize items

incorporated in **Attachment B**, which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1) and 846, and fruits thereof.

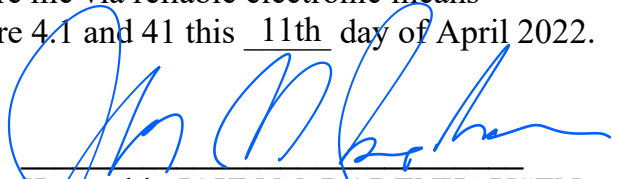
22. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public at this time, I am requesting that this affidavit and the accompanying search warrant documents be sealed until further court order.

I state under penalty of perjury the forgoing is true and correct.



JARED M. RUHLAND  
United States Postal Inspector

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 11th day of April 2022.



Honorable JOHN M. BODENHAUSEN  
United States Magistrate Judge  
Eastern District of Missouri

### **ATTACHMENT A - TARGET LOCATION**

The **Target Location** is described as the following: **2713 Hermitage Avenue Saint Louis, Missouri 63143** (hereinafter referred to as the **Target Location**), further described in **Attachment A** as a single family residence tan sided structure. The residence has a brown door. The numbers “2713” are gold colored to the right of the door. Photographs of the **Target Location** are attached hereto and made a part of this Affidavit as **Attachment A**.



**ATTACHMENT B: List of Items to be Seized**

1. Controlled Substances:
2. Priority Mail package **9505513822772095606666**.
3. Paraphernalia for packaging, cutting, weighing and distributing controlled substances, including but not limited to scales, baggies and heat sealers; and
4. Books, records, receipts, notes, ledgers, computer hard-drives and disk records, and other papers relating to the transportation, ordering, purchasing and distribution of controlled substances and/or firearms;
5. Telephone bills, invoices, packaging, cellular batteries and/or charging devices, cancelled checks or receipts for telephone purchase/service; cellular and/or landline telephones; digital and/or alphanumeric text (two-way) pagers; computers capable of e-mail and/or chat-room communication, answering machines; address and/or telephone books and papers reflecting names, addresses, and/or telephone numbers of sources of supply, of customers, and/or evidencing association with persons known to traffic in controlled substances or to facilitate such trafficking.
6. Photographs, in particular photographs of co-conspirators, of assets, and/or of controlled substances.
7. United States Currency, precious metals, jewelry, and financial instruments, including but not limited to, stocks and bonds, papers, titles, deeds and other documents reflecting ownership of vehicles and property utilized in the distribution of controlled substances or which are proceeds from the distribution of controlled substances;
8. Books, records, receipts, pay stubs, employment records, bank statements and

records, money drafts, letters of credit, money order and cashier's checks receipts, passbooks, bank checks and other items evidencing the obtaining, secreting, transfer and/or concealment of assets and the obtaining, secreting, transfer, concealment and/or expenditure of money;

9. Papers, tickets, notes, schedules, logs, receipts and other items relating to travel, including but not limited to, travel to and from St. Louis, Missouri and elsewhere; and

10. Indicia of occupancy, residency, rental and/or ownership of the vehicles and/or premises described above, including but not limited to, utility and telephone bills, cancelled envelopes, rental or lease agreements and keys.